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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Cristiano Amparo, an individual; Abel
Millares-Rojas, an individual,

Plaintiffs,

v.

United States of America,

Defendant.

Case No. 2:24-cv-00394-JAD-BNW

**Stipulation and Order to
Extend Certain Discovery Deadlines
(Third Request)**

Pursuant to LR IA 6-1 and LR 26-3, the parties request an extension of the May 3, 2025, deadline to disclose initial experts to June 3, 2025, and all other discovery deadlines including joint pretrial order (JPTO) deadlines thereafter, as follows. This extension is made 21 days from the current initial expert disclosure deadline. The reason for the extension is that the parties are in the process of scheduling depositions of the plaintiffs and Defendant is still waiting for the plaintiffs' discovery responses which are due on April 16, 2025. In addition, although Defendant has received some of plaintiffs' medical records, it is still waiting to receive the rest of the plaintiffs' medical records, which were subpoenaed on February 7, 2025. Defendant is following up with the medical providers whose records are outstanding. Such information is not likely to be received in time for the experts to review and to prepare their expert reports prior to the current initial expert disclosure deadline of May 3, 2025. This is the third request for an extension.

DISCOVERY COMPLETED

The parties have completed the following disclosures and discovery:

The parties served their respective initial disclosures.

1 Plaintiffs served discovery requests upon the Defendant to which Defendant has
2 responded. Defendant served discovery requests upon the plaintiffs, whose responses are
3 due on April 16, 2025.

4 **DISCOVERY REMAINING**

5 There are two plaintiffs in this case. The parties need to serve discovery requests,
6 obtain all of plaintiffs' medical records and diagnostic imaging, retain experts after the
7 medical records and imaging are obtained and conduct all necessary depositions. Defendant
8 is in the process of scheduling plaintiffs' depositions and all other necessary parties. One of
9 the plaintiff's depositions was scheduled for April 11, 2025, at Oasis/Lexitas. That
10 deposition had to be rescheduled after Defendant was informed by Oasis/Lexitas that its
11 building was undergoing renovations and painting. The parties are working to schedule all
12 necessary depositions at time and date convenient for all.

13 **WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

14 The remaining discovery has not been completed, as the Defendant is still waiting to
15 receive plaintiffs' medical records and imaging after the subpoenas for such records were
16 sent on February 7, 2025. The deposition of plaintiff Millares-Rojas had to be rescheduled
17 due to Oasis/Lexitas building renovations. The parties are also working on scheduling the
18 plaintiffs' depositions at times and dates convenient for all. In addition, the current change
19 of administration in Washington, DC has influenced the budget to retain experts, which
20 also necessitates the request for the extension. The parties need the additional time to receive
21 plaintiffs' discovery responses, to receive the reminder of plaintiffs' medical records and
22 imaging, retain experts, and conduct all necessary depositions. Plaintiffs' counsel agrees to
23 this extension. This request is filed within 21 days of the initial expert disclosure deadline.
24 For these reasons, the parties agreed to the revised schedule below to have the necessary
25 time to complete the discovery in this case.

26 **EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER**

27 The extension of the remaining deadlines in the case would result in the following
28 revised discovery schedule:

| SCHEDULED EVENT | CURRENT DEADLINE | PROPOSED DEADLINE |
|-------------------------------|------------------|-------------------------|
| Close of Discovery | 07/02/2025 | 08/04/2025 ¹ |
| Initial Expert Disclosures | 05/03/2025 | 06/03/2025 |
| Rebuttal Expert Disclosures | 06/09/2025 | 07/09/2025 |
| Dispositive Motions | 08/18/2025 | 09/18/2025 |
| Proposed Joint Pretrial Order | 09/30/2025 | 10/30/2025 |

This request for an extension of time is not sought for any improper purpose including delay.

Respectfully submitted this 11th day of April 2025.

THE BIG GUNS INJURY ATTORNEYS

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IT IS SO ORDERED:


 UNITED STATES MAGISTRATE JUDGE

DATED: April 14, 2025

¹ August 2, 2025 is a Saturday.